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18 **UNITED STATES DISTRICT COURT**
19 **NORTHERN DISTRICT OF CALIFORNIA**
20 **SAN FRANCISCO DIVISION**

21 IN RE: UBER TECHNOLOGIES, INC.,
22 PASSENGER SEXUAL ASSAULT
23 LITIGATION

Case No. 3:23-md-03084-CRB

**DECLARATION OF RANDALL S. LUSKEY
IN SUPPORT OF DEFENDANTS' POSITIONS
IN THE JOINT LETTER REGARDING THE
GUS FULDNER DEPOSITION AND APEX
ORDER**

24 This Document Relates to:
25 ALL ACTIONS

26 Judge: Hon. Lisa J. Cisneros
27 Courtroom: G – 15th Floor

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DECLARATION OF RANDALL S. LUSKEY

I, Randall S. Luskey, declare pursuant to 28 U.S.C. § 1746:

1. I am over 18 years of age, of sound mind, and competent to make the statements in this declaration. I am an attorney at law duly licensed to practice before all courts of the State of California and a partner at the law firm of Paul, Weiss, Rifkind, Wharton & Garrison LLP attorneys of record for Defendants Uber Technologies, Inc., Rasier, LLC, and Rasier-CA, LLC in the above-captioned matter. I have personal knowledge of the facts set forth herein, except where stated upon information and belief, and if called as a witness to testify, I could and would competently testify as to the truth of the same if requested to do so.

2. I submit this declaration in support of Defendants' positions in the April 1, 2025 Joint Letter Regarding Gus Fuldner Deposition and Apex Order.

3. Attached to this declaration as **Exhibit 1** is a true and correct copy of excerpts of the rough transcript of the March 26, 2025, Deposition of Henry Gustav Fuldner coordinated between *In Re: Uber Rideshare Cases*, Case No. CJC-21-005188 (the "JCCP") and this litigation.

4. Attached to this declaration as **Exhibit 2** is a true and correct copy of excerpts of the rough transcript of the March 27, 2025, Deposition of Henry Gustav Fuldner coordinated between the JCCP and this litigation.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on April 1, 2025 in San Francisco, California.

/s/ Randall S. Luskey

Randall S. Luskey